REMARKS

Claims 1-23 were rejected as indefinite and confusing and because it is not clear if the method that is claimed refers to forming a brush or cleaning semiconductor wafers. The claim has been amended to make it clear that claim 1 relates to forming a brush. The objection as applied to claim 13 is not understood. The objection to claim 1, line 2, on antecedent basis has been corrected. Likewise, the objection to claim 23 has been corrected.

The objection set forth in paragraph 3 of the office action, under Section 112, second paragraph, should be reconsidered. In order to be essential, the material must be stated to be essential in the specification. Here, there is no such assertion. Moreover, it is a perfectly legitimate invention to come up with a way to form a brush and a perfectly legitimate another invention to come up with a way to clean a semiconductor wafer. There is no requirement that one claim cover both elements since, plainly, different individuals would be involved in each action. Therefore, there is no reason to apply such an analysis.

Moreover, the application of the objection to claim 13 is not understood since it does recite the allegedly missing cleaning steps.

With respect to the prior art rejection, it is respectfully submitted that the cited references referring to polymer brushes do not refer to anything that would be suitable as a brush for cleaning a semiconductor wafer. The term "polymer brushes" is meant to apply, in these references, to a polymer structure, not to a cleaning brush. See, for example, the specification of Lee '616 at paragraphs 3 and 4. See the specification of Klaerner throughout.

The attempt to combine these so-called polymer structural patents with a patent which discloses the possibility of cleaning with a brush is unavailing. There is no reason to combine the specific polymer structures described in the references with a cleaning brush described in Lofaro. The only basis is the unusual coincidence that the polymer structure described in some of the references is referred to as a brush, although it would not qualify as a cleaning brush under any common understanding of that phrase.

Thus, there is no rationale to combine the references and the rejection should be reconsidered.

Respectfully submitted,

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